SPECIAL INSPECTION

PROGRAM APPLICABILITY: 2515

93812-01 INSPECTION OBJECTIVE

01.01 ~~To provide implementing procedures for Special Inspection (SI) responses to operational events at power reactor licensee facilities.~~

~~Note: The revision to Management Directive 8.3, "NRC Incident Investigation Program," (to be issued early this year) defines the authorities, responsibilities, and basic requirements for personnel investigating significant operational power reactor events. These events may include significant unplanned degraded conditions identified by the licensee or NRC. Management Directive 8.3 also characterizes the differences between an Augmented Inspection Team (AIT), Incident Investigation Team (IIT), and SI.~~ A special inspection (SI) is the event assessment response assigned by the NRC in accordance with Inspection Manual Chapter (IMC) 0309, "Reactive Inspection Decision Basis for Reactors." The inspection is conducted based on a charter issued to the team. Through the charter, the SI team is assigned to conduct an inspection of the event.

93812-02 INSPECTION REQUIREMENTS

02.01 SI Leader

a. Acts as the supervisor of the SI.

b. Provides input to development of SI charter.

c. Conducts an entrance meeting with the licensee to discuss the purpose and scope of the SI response, and to:

1. Obtain the licensee's understanding of the event (including operator actions and the performance of safety systems).

2. Request licensee assistance in scheduling interviews, obtaining information related to the event, and, if needed, assisting in inspection activities related to the event.

3. Discusses the quarantined equipment list (QEL), if applicable, and the procedure for changing it.

d. Before the end of the first day on site:

1. Provides a recommendation to the Regional Administrator as to whether the SI should continue or be upgraded to an AIT response.

2. If a Preliminary Notification (PN) is required, prepares and transmits a PN report to the Regional Administrator for distribution. MC 1120, "Preliminary Notifications", has criteria for issuing a written PN. If a PN is not required, a Morning Report may be appropriate.

e. As applicable, prepares supplemental PN reports and/or regional Morning Report inputs when there is significant new information to report. The objective is to keep management informed of significant facts, findings, and progress of the inspection.

f. Conducts an exit meeting with the licensee to:

1. Summarize the SI inspection effort.

2. As appropriate, discuss preliminary findings, observations, or issues resulting from the SI.

g. Manages the SI effort in fact-finding and analysis to meet the objectives of the SI charter.

h. Establishes guidelines for team members to document their inspection activities for the final report.

i. Prepares a report for the Regional Administrator documenting the findings of the SI. May direct the SI members to remain together, either at the inspection site or at the Regional Office, to facilitate the preparation of the SI report.

02.02 <u>SI Members</u>

a. Report directly to the SI leader. Members are assigned to the SI until released by the leader.

b. Conduct a timely, thorough and systematic inspection of significant operational events at facilities licensed by the NRC, under the supervision of the SI leader. In so doing, members shall:

1. Assess the safety significance of the event under the guidance of the SI leader.

2. Collect, analyze and document factual information and evidence as directed by the SI leader.

DRAFT

3. Evaluate the adequacy of licensee response to an event under the guidance of the SI leader.

4. Utilize IMC 0609, "Significance Determination Process", to evaluate the risk significance of inspection findings.

c. Remain together after the inspection, at the discretion of the SI leader, for the purpose of preparing the SI report.

93812-03 INSPECTION GUIDANCE

03.01 Scope of SI Response. The following guidance should not be construed as limiting SI authority to pursue all pertinent aspects of an event. However, safety (or regulatory) concerns raised that may or may not be directly related to the event under consideration should be reported to Headquarters and/or Regional Office management for appropriate action.

a. Identify potential generic safety concerns in a timely manner to the regional management who will initiate follow-up actions. Recommendations for immediate follow-up actions, such as issuance of Information Notices, Generic Letters, or Bulletins, shall also be made through the normal organizational structure and procedures.

b. Emphasize fact finding, i.e., fully understanding the circumstances surrounding an event and probable cause(s), including conditions preceding the event, chronology, systems response, equipment performance, precursors, human factors considerations, quality assurance considerations, radiological considerations, and safeguards considerations. Also consider facts in those areas that indicate contributing causes including the components of a safety culture as described in IMC 0305.

c. Base the fact-finding effort on the most timely, reliable evidential material, including interviews and other documented material related to the event previously obtained by internal audit or investigative groups.

d. It is not the responsibility of an SI to:

1. Examine the regulatory process (to determine whether that process contributed directly to the cause or course of the event).

2. Address licensee actions related to plant restart.

3. Address the applicability of potential generic safety concerns to other facilities.

03.02 Documentation. SIs should be documented in accordance with IMC 0612, except as follows. The forwarding letter should briefly describe the event or degraded condition. The body of the report should have the following outline:

DRAFT

a. Description and chronology of event or degraded condition.

b. Probable contributing causes of the event or degraded condition, where applicable:

1. Equipment failures.

2. Human factor and procedural issues.

3. Quality assurance issues.

4. Radiological issues.

5. Safeguards issues.

Item a. should be documented narratively, not in the IMC 0612 format regarding inspection scope and findings. Items b.1 through 5 potentially include findings, and should be in the IMC 0612 format regarding inspection scope and findings. Due to the sensitive nature of SIs, areas where no findings are identified should be documented in greater detail than required by IMC 0612. The results of this inspection may be used to inform a subsequent supplemental inspection (95001,95002, or 95003) based on the final determination of the risk significance of the event.

03.03 Communications

a. The SI leader. The SI leader is encouraged to maintain communications with cognizant personnel from the Regional Office, NRR or NMSS, and IRO, when the chronology and circumstances of the event are more clearly understood, to provide a first-hand update of the event and respond to any questions, and to discuss the appropriateness of the SI response.

93812-04 INSPECTION RESOURCES

The SI leader should be a senior inspector or engineer. Group expertise is based upon the nature of the event, as well as the uncertainty of influential assumptions affecting the risk significance of the event. Resources of technical experts from the responsible regional office are comparable for SIs and AITs, but SIs (unlike AITs) are not augmented by personnel from Headquarters, other regions, or contractors with special technical qualifications to complement the regional technical expertise.

93812-05 REFERENCES

Management Directive 8.3, “NRC Incident Investigation Procedures”

NUREG 1303, “Incident Investigation Manual”

Inspection ~~Procedure 93800~~Manual Chapter 0309, ~~“Augmented~~“Reactive Inspection ~~Team”~~Decision Basis for Reactors”

Inspection Manual Chapter 0609, “Significance Determination Process”

Inspection Manual Chapter 0612, “Power Reactor Inspection Reports”

END

DRAFT